

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☒ INFORMATION ☐ INDICTMENT
☒ SUPERSEDING
OFFENSE CHARGED
 VIOLATIONS: 18 U.S.C. § 1344(1) and (2) - Bank Fraud; 18
 U.S.C. § 1028A - Aggravated Identity Theft

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

 PENALTY: Counts one and two: 18 U.S.C. 1344(1) and (2), Bank Fraud:
 30 years in prison; \$1 million fine; 5 years supervised release
 \$100 special assessment
 Count Three: 18 U.S.C. 1028A
 2 years in prison consecutive sentence


Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

▶ VALERIAN DOBRE

DISTRICT COURT NUMBER

No. CR 07-0560 JSW

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

United States Secret Service

☐ person is awaiting trial in another Federal or State Court,
 give name of court

☐ this person/proceeding is transferred from another district
 per (circle one) FRCrp 20, 21, or 40. Show District

☐ this is a reprosecution of
 charges previously dismissed
 which were dismissed on motion
 of:

☐ U.S. ATTORNEY ☐ DEFENSE
SHOW
DOCKET NO.
☐ this prosecution relates to a
 pending case involving this same
 defendant
MAGISTRATE
CASE NO.
☐ prior proceedings or appearance(s)
 before U.S. Magistrate regarding this
 defendant were recorded under

 Name and Office of Person
 Furnishing Information on this form JOSEPH P. RUSSONIELLO

☒ U.S. Attorney ☐ Other U.S. Agency

 Name of Assistant U.S.
 Attorney (if assigned) Christina J. Hua, AUSA
IS NOT IN CUSTODY

Has not been arrested, pending outcome this proceeding.

 1) ☐ If not detained give date any prior
 summons was served on above charges ▶
2) ☐ Is a Fugitive3) ☐ Is on Bail or Release from (show District)**IS IN CUSTODY**4) ☒ On this charge
 5) ☐ On another conviction } ☐ Federal ☐ State

 6) ☐ Awaiting trial on other charges
 If answer to (6) is "Yes", show name of institution

 Has detainer ☐ Yes
 been filed? ☐ No

 If "Yes"
 give date
 filed
DATE OF
ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

 DATE TRANSFERRED ☐ Month/Day/Year
 TO U.S. CUSTODY

☐ This report amends AO 257 previously submitted
ADDITIONAL INFORMATION OR COMMENTS**PROCESS:**
☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

 * Where defendant previously apprehended on complaint, no new summons or
 warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

JOSEPH P. RUSSONIELLO (CNB 44332)
United States Attorney

FILED

08 MAY 28 AM 11:57

RICHARD W. WIERING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

VALERIAN DOBRE,

Defendant.

No. CR 07-0560 JSW

VIOLATIONS: 18 U.S.C. § 1344(1) and
(2) – Bank Fraud; 18 U.S.C. § 1028A -
Aggravated Identity Theft; 18 U.S.C. § 2
- Aiding and Abetting

SAN FRANCISCO VENUE

SUPERSEDING INFORMATION

The United States Attorney charges:

Introductory Allegations

At all times relevant to this Superseding Information:

1. Citibank was a “financial institution” within the meaning of 18 U.S.C. §20(1), the deposits of which were insured by the Federal Deposit Insurance Corporation.

2. Citibank bank account numbers, automated teller machine (“ATM”) numbers, and personal identification numbers (“PINs”) are “access devices” within the meaning of 18 U.S.C. § 1029(e)(1).

3. Citibank bank account numbers, ATM numbers, and PINs are “means of identification” within the meaning of 18 U.S.C. § 1028(d)(7)(D).

1 4. Bank Fraud, in violation of 18 U.S.C. §1344(1) and (2), is a felony violation
2 enumerated in 18 U.S.C. 1028A(c)(5).

3 COUNTS ONE AND TWO: (18 U.S.C. §§ 1344(1) and (2) and 18 U.S.C. §2 - Bank
4 Fraud and Aiding and Abetting)

5 The Scheme to Defraud

6 5. Between on or about a date unknown, but no later than May 2007, through
7 on or about July 28, 2007, the defendant VALERIAN DOBRE did knowingly execute a
8 material scheme and artifice to defraud a financial institution and to obtain monies and
9 funds owned by and under the custody and control of a financial institution, by means of
10 materially false and fraudulent pretenses, representations, and promises, well knowing
11 that the pretenses, representations, and promises were materially false when made.

12 6. From on or about a date unknown, but no later than July 27, 2007, through
13 on or about July 28, 2007, DOBRE and others obtained Citibank ATM card numbers,
14 account numbers, and PINs without authorization.

15 7. From on or about a date unknown, but no later than July 27, 2007, through
16 on or about July 28, 2007, DOBRE and others obtained money under the custody and
17 control of Citibank, under the fraudulent pretenses of being authorized to use these ATM
18 card numbers and PINs belonging to other persons, knowing that such access devices
19 belonged to other persons and that such use was not authorized.

20 8. On or about the following dates, in the Northern District of California and
21 elsewhere, for the purpose of knowingly executing and attempting to execute a material
22 scheme and artifice to defraud a financial institution, and for the purpose of obtaining
23 moneys and funds owned by and under the custody and control of a financial institution
24 by means of materially false and fraudulent pretenses, representations and promises, well
25 knowing that the pretenses, representations and promises were materially false when
26 made, the defendant

27 VALERIAN DOBRE

28 did knowingly make and cause to be made the following unauthorized ATM cash
withdrawals from Citibank:

<u>Count</u>	<u>Date</u>	<u>Withdrawal Amount</u>	<u>Last 5 Digits Card Number</u>	<u>Citibank ATM Machine Branch</u>	<u>Person</u>
1	7/27/07	\$4,000	67049	FC 948, 2499 Ocean Avenue, San Francisco, California	Dobre
2	7/28/07	\$2,000	01652	FC 904, 99 Post Street, San Francisco, California	Dobre

All in violation of Title 18, United States Code, Sections 1344(1) and (2) and 2.

COUNT THREE: (18 U.S.C. § 1028A- Aggravated Identity Theft)

9. The allegations contained in Paragraphs 1-8 of this Superseding Information are realleged as though fully set forth herein.


10. On or about July 27, 2007, during and in relation to committing the bank fraud violation as set forth in Count 1 of the Superseding Information, the defendant

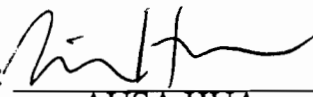
VALERIAN DOBRE

did knowingly possess and use without lawful authority, a means of identification of another person, to wit: the Citibank bank account number, ATM number, and PIN associated with a Citibank ATM card, the last five digits of which were 67049.

DATED: 5-20-08

JOSEPH P. RUSSONIELLO
United States Attorney


BRIAN J. STRETCH
Chief, Criminal Division

(Approved as to form: 
AUSA HUA)